

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA

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§
§

vs.

CASE NO. 3:24-CR-00049-S

AMIR MORTAZAVI (01)

§

**DEFENDANT AMIR MORTAZAVI'S UNOPPOSED
MOTION FOR TEMPORARY RELEASE OF PASSPORT**

Defendant Amir Mortazavi (“Mortazavi”), by and through his counsel of record, respectfully submits this Unopposed Motion for Temporary Release of Passport for the Court’s consideration and, in support thereof, shows as follows:

1. On March 4, 2024, United States Magistrate Rebecca Rutherford entered an Order Setting Conditions of Release with respect to Mortazavi, including a condition that Mortazavi surrender his passport to the United States District Clerk (DKT 51). On the same day, the Deputy Clerk of the Court entered a Receipt of Passport acknowledging that Mortazavi had complied with the Order to surrender his passport to the District Clerk (DKT 53). Custody of Mortazavi’s passport remains with the District Clerk’s Office in Dallas.

2. Mortazavi’s passport expired on July 7, 2024. Mortazavi wishes to obtain the expired passport from the District Clerk in order to renew it through the United States Department of State.

3. If a new passport is issued, Mortazavi or his counsel will promptly surrender the passport to the District Clerk.

4. On July 24, 2024, counsel for Mortazavi confirmed with Assistant United States Attorney Chad Meacham that he does not oppose this motion for the District Clerk's office to release Mortazavi's passport to him or his counsel of record.

5. Mortazavi, therefore, respectfully requests that this Court order the United States District Clerk for the Northern District of Texas to temporarily return to Mortazavi or his counsel of record his passport currently in the District Clerk's custody.

Respectfully submitted,

/s/ Paul E. Coggins

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ATTORNEYS FOR AMIR MORTAZAVI

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with counsel for the Government regarding the relief sought herein on July 24, 2024, and counsel indicated that the Government is unopposed.

/s/ Paul E. Coggins

Paul E. Coggins

CERTIFICATE OF SERVICE

I hereby certify that, on July 24, 2024, the foregoing document was served on all counsel of record via ECF in accordance with the Federal Rules of Civil Procedure.

/s/ Paul E. Coggins

Paul E. Coggins